

GABRIEL M. RAMSEY (SBN 209218)
gramsey@crowell.com
JOACHIM B. STEINBERG (SBN 298066)
jsteinberg@crowell.com
CROWELL & MORING LLP
3 Embarcadero Center, 26th Floor
San Francisco, CA 94111
Telephone: 415.986.2800
Facsimile: 415.986.2827

Attorneys for Defendant
ERIC BRAVICK

Bradford K. Newman, State Bar No. 178902
bradford.newman@bakermckenzie.com

BAKER & MCKENZIE LLP
600 Hansen Way
Palo Alto, CA 94304-1044
Telephone: +1 650 856 2400
Facsimile: +1 650 856 9299

Christina M. Wong, State Bar No. 288171
christina.wong@bakermckenzie.com

BAKER & MCKENZIE LLP
2 Embarcadero Center, Floor 11
San Francisco, CA 94111
Telephone: +1 415 576 3000
Facsimile: +1 415 576 3099

Attorneys for Plaintiff
DFINITY USA RESEARCH, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DFINITY USA RESEARCH, LLC, a limited
liability company,

Plaintiff,

v.

ERIC BRAVICK, an individual and DOES 1
through 100, inclusive,

Defendant.

Case No. 5:22-cv-03732-EJD

**JOINT STATEMENT IN RESPONSE
TO ORDER TO SHOW CAUSE**

Complaint filed: May 11, 2022

By and through their respective counsel, Plaintiff DFINITY USA Research, LLC (“DFINITY”) and Defendant Eric Bravick (“Bravick”) (collectively, “Parties”) submit this joint statement in response to the Order to Show Cause re Settlement (Dkt. No. 25, Apr. 4, 2023).

A. Status of the Settlement Agreement

Although the Parties agreed in principle upon the economics of a settlement and expectation that a written settlement agreement would be prepared, the Parties have since exchanged multiple settlement agreement iterations and have agreed in principle on all but one term of the settlement—the scope and nature of the release.

B. Prospects for Further Negotiation

The Parties continue to be willing to negotiate a settlement of the claims and believe a resolution can be reached. The Parties thus request an additional three weeks to continue negotiations.

C. Procedural Next Steps

The Parties respectfully request that the Court reschedule the hearing on the Order to Show Cause, currently set for June 1, 2023, to June 22, 2023, and order the Parties to submit an additional Joint Statement on or before June 9, 2023.

Dated: May 19, 2023

Respectfully submitted,

CROWELL & MORING LLP

By: /s/ Joachim B. Steinberg

Gabriel M. Ramsey
Joachim B. Steinberg

Attorneys for Defendant
ERIC BRAVICK

Dated: May 19, 2023

BAKER & MCKENZIE LLP

By: /s/ Bradford K. Newman

Bradford K. Newman
Christina M. Wong

Attorneys for Plaintiff
DFINITY USA RESEARCH, LLC

FILER'S ATTESTATION

I, Joachim B. Steinberg, am the ECF user whose identification and password are being used to file this **JOINT STATEMENT IN RESPONSE TO ORDER TO SHOW CAUSE**. I hereby attest that the other above-named signatory concurs in this filing.

Dated: May 19, 2022

/s/ Joachim B. Steinberg
Joachim B. Steinberg